

RICHMOND POLICE DEPARTMENT



11-25

HUMAN RESOURCES DIVISION OPERATING MANUAL

Chief of Police or Designee

7/28/2008

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PURPOSE

The purpose of the Human Resources Division Operating manual is to describe the Division's responsibilities and duties within the department. This manual standardizes and codifies the steps and policies used in attracting, hiring, training and retaining personnel to the Richmond City Police Department.

The City of Richmond Police Department is an Equal Opportunity Employer. The mission of the Division of Human Resources is to administer and evaluate all policies and procedures within the department to ensure all individuals within the department are afforded equal employment opportunities regardless of race, gender, color, ethnicity, age, natural origin or sexual preferences. Additionally, policies and procedures will be periodically checked for adverse impact and disparate treatment.

The Human Resource Division Chief (HR Division Chief) or designee, will keep this manual updated.

HUMAN RESOURCES DIVISION- PERSONNEL

The Human Resources Division will operate under the guidance of the HR Division Chief, and is comprised of five (6) units; Background Investigations, Civilian Training, Employee Relations (HR), Polygraph, Risk Management and Recruitment.

The units are staffed as follows:

- 1 Human Resources Lieutenant
- 1 Personnel & Recruitment Sergeant
- 4 Background Investigators / Recruiting Officers
- 1 Primary Recruiting Officer / Background Investigator
- 2 Polygraph Examiners / Background Investigators / Recruiting Officers
- 2 Administrative Program Support Assistants
- 2 Human Resources Consultants
- 1 Occupational Safety & Health Specialist
- 1 Administrative Project Analyst
- 1 Senior Training Coordinator

All members of the Division, civilian and sworn, have the additional duty to perform the role of an RPD Recruiter and will assist in all recruitment efforts. Unit members will consider each ethnic and cultural group in the community as potential recruits and are encouraged to present a professional and positive image at all times. Prospective recruits shall be provided with up to date employment information, to include the employment application web site location and upcoming testing dates.

Human Resource Division Chief

The Human Resources Division Chief has the authority and responsibility for the efficient operation of the Human Resources Division. This includes general leadership and oversight of all

daily operations of the Division. This position is also responsible for ensuring the Richmond City Police department is fair, equitable, and consistent with all Federal/State/Local Employment Laws, City of Richmond Administrative Regulations, Personnel Rules and Pay Ordinances, to include but not limited to, Classification & General Salary Administration, Recruitment & Staffing, Employee Relations and Training. In addition, General Employment Practices, such as reassignments, transfers, performance demotions, reallocations, and grievance coordination & maintenance also fall under the auspices of the HR Division Chief. Assessment Center development, coordination and implementation will also fall under the guidance of the RPD HR Division Chief with assistance from the City's Central Human Resources Division being provided as requested.

HR Division Lieutenant

The HR Division Lieutenant will be responsible for the following:

1. Serve as the HR Division Chief's representative at meetings and events in the HR Division Chief's absence to professionally engage citizens and/or the Command Staff with no diminishing effect
2. Maintain a working knowledge of all policies relative to personnel management
3. Manage the duties of the HR Personnel & Recruiting Sergeant
4. Manage the duties of the Administrative Program Support Assistants
5. Manage the duties of the Administrative Analyst
6. Manage the duties of the Occupational Safety & Health Specialist
7. Manage the duties of the HR Consultants

Personnel & Recruitment Sergeant

The Personnel & Recruitment Sergeant will be primarily responsible for the following:

1. Review of all applicant screening reports
2. Maintain a working knowledge of all policies relative to personnel management
3. Track the status of all applicants through each phase of the investigative process
4. Knowledge of the department's hiring criteria for each position classification and ensures compliance with all applicable policies in the hiring process
5. Knowledge of the department's medical requirements for each position classification and ensure compliance with all health and safety regulations.
6. Coordinate and conduct roll call training as needed. (General Orders Updates)
7. Conduct inspections and ensure the Unit is in compliance with all accreditation standards and departmental policies and procedures.
8. Ensure the timely completion of all background investigations.
9. Ensure appropriate investigative follow-up on applicants denied employment as a result of criminal conduct.
10. Evaluate employment feasibility of applicants through test results, polygraph findings, and psychological screening
11. Recommend employment decisions to the next supervisory level.
12. Update applicant status reports based upon information received during background investigation
13. Notify applicants denied employment by letter in a timely fashion
14. Assist other unit/divisional employees, as necessary
15. Supervise five background investigators and 2 polygraph examiners

16. Assist other unit/divisional employees, as necessary
17. Manage employee leave balances

Background Investigators

Background Investigators are primarily responsible for reviewing investigative documents to determine an applicant's status and potential for hire. Investigators are also responsible for collecting necessary information from the applicant; maintaining confidentiality of all information received; evaluating standards that may disqualify candidates for hire and maintaining accurate records. Background Investigators' primary responsibilities also include the following:

1. Knowledge of all policies relative to personnel management, employment laws and departmental hiring practices
2. Conduct criminal and traffic record checks via the email, mail, teletype, telephone, and in person appearances, to include contacting other law enforcement agencies for information in their respective jurisdictions
3. Conduct comprehensive credit checks using the Equifax Credit Service to determine financial stability of the applicant
4. Field interviews of the applicant's personal references, neighbors, employers (past and present) and educators
5. Develop informational sources other than those listed on the application, such as myspace.com and facebook.com
6. Conduct in-depth interviews with all applicants
7. Schedule pre-employment polygraph examination and psychological evaluation
8. Schedule the applicant for pre-employment physicals/drug screen
9. Provide a detailed written report of the investigation and make a hiring recommendation pertaining to the applicant's suitability for employment
10. Contact INTERPOL on any applicant who is not a U.S. resident or who has resided abroad (not required on official U.S. Government employees or military personnel serving abroad)
11. Contact other jurisdictions when necessary to report any criminal conduct information received as a result of any investigation

Polygraph Examiners

Polygraph Examiners are responsible for professionally conducting electronic monitoring exams using calibrated polygraph equipment recording the results. Examiners perform all exams in accordance with IAW procedures established in G.O. 113-5. When conducting a pre-employment, the Polygraph Examiner will:

1. Maintain a working knowledge of all policies relative to personnel management, employment laws and departmental hiring practices
2. Maintain on – line polygraph scheduling module for background detectives to track applicant appointments
3. Conduct pre-test interviews with examinee
4. Conduct polygraph examination on examinee
5. Conduct post-test interview with examinee

6. Complete and submit polygraph examination report to the examinee's assigned background investigator
7. Maintain confidential files on all examinees in accordance with all state and federal laws

Primary Recruitment Officer

The Primary Recruitment Officer (PRO) assists the Personnel & Recruitment Sergeant with the identification, coordination and management of all recruitment and community based events.

The PRO is primarily responsible for the following:

1. Working knowledge of all policies relative to personnel management, employment laws, and departmental hiring practices.
2. Locate, identify, attract and encourage potential candidates to enter the application process for RPD sworn and civilian vacancies.
3. Encourage various educational, military and community-based organizations to promote RPD as an employer of choice.
4. Develop RPD career presentations and job fair opportunities with various educational, military and community based organizations.
5. Facilitate the acquisition of all recruitment materials and ensure that all materials needed for recruitment displays are up-to-date and appropriately stocked.
6. Maintain membership in associations and organizations dedicated to enhancing relationships with other law enforcement organizations and recruitment associations.
7. Preparing operational plans for out of town recruitment events.
8. Update the unit's Operational Review Report.
9. Manage the department's college and internship Program.

Recruitment Officers

All members of the Human Resources Division have the additional duty of Recruitment Officer. The duty of the Recruiting Officer is to assist the PRO with all recruitment efforts. In addition the Recruitment Officer will:

1. Handle inquiries from potential applicants.
2. Assist the Personnel & Recruitment Sergeant in conducting applicant testing.
3. Schedule ride-alongs for applicants.
4. Contact potential applicants.

Administrative Program Support Assistant (Clerical)

The Administrative Support Assistants are primarily responsible for ensuring that the day to day administrative operations of the unit are managed efficiently and professionally. The Administrative Program Support Assistant/Clerical is primarily responsible for:

1. Knowledge of all policies relative to personnel management and departmental hiring process.
2. Provide optimal customer service to both external and internal customers.
3. Screen, certify and track applicant testing records and information.
4. Handle telephonic inquiries and providing assistance and information to all callers.
5. Respond to all email inquiries in a timely fashion.

6. Ensure office supplies are ordered and stocked.
7. Prepare certification lists for new hires by completing all required forms.
8. Manage 'New Hire' process, to include conducting employee orientation, hiring paperwork completion and data entry of information into CEPS
9. Ensure that all benefits information is updated and available.
10. Provide employees with Personnel, Substance Abuse, Administrative Regulations and Retirement Brochures.
11. Inform employees of other employment related benefits, to include direct deposit opportunities, utilization of the police credit union and other available services.
12. Provide telephonic and written verifications of employment.
13. Notify the Department of Criminal Justice Services of Personnel Changes such as name change, rank, termination, resignations, deaths, etc.
14. Assist other unit/division personnel as necessary.
15. Pick up and distribute mail within the office.
16. Provide "Notice of Termination" to HR staff when employees retire, resign, etc.
17. Prepare retirement documents.
18. Plan special events, projects, and functions, such as retreats, retirement luncheons, meetings, conferences, training programs, seminars, etc.
19. Assist the HR Chief with special projects as requested.
20. Provide clerical support and assist administrative professionals as needed.

Administrative Program Support Assistant (Records Management)

The Administrative Program Support Assistant/Records Management is primarily responsible for:

- 1 Knowledge of all policies relative to personnel management and departmental practices.
- 2 Manage all Personnel Files and Personnel Databases, to include updates in ACCESS, CEPS and Pistol.
- 3 Manage file room to include the proper disposition of all data contained therein.
- 4 Ensure compliance with the state's record's retention policies.
- 5 Ensure compliance with the department's Accreditation Standards as it relates to records retention.
- 6 Conduct off site inspections and audits of divisional files.
- 7 Conduct routine audits of all personnel databases to include the department's organizational structure to ensure accuracy of information.
- 8 Prepare the department's Personnel Memo relative to personnel transfers, re-assignments and promotions.
- 9 Prepare all purchase vouchers and track budget expenditures.
- 10 Assist Human Resource Staff as needed.
- 11 Providing optimal customer service to both external and internal customers.
- 12 Handling telephonic inquiries and providing assistance and information to all callers.
- 13 Compose applicant tracking correspondence to include letters, memos, and e-mails to applicants regarding testing dates, interview appointments, etc.
- 14 Support the Investigative and Recruitment units as needed
- 15 Assist the unit HR Chief with special projects as requested.

Administrative Project Analyst

The Administrative Project Analyst will perform the following tasks:

- 1 Knowledge of all policies relative to personnel management and departmental hiring practices.
- 2 Maintain an accurate accountability of the RPD's personnel strength.
- 3 Weekly prepare appropriate personnel strength and status reports for Staff Meetings.
- 4 Update employee status reports and track all military activations.
- 5 Input all Commendations, Infractions, and Accidents into computer database.
- 6 Complete personnel related surveys as requested.
- 7 Enter information into the ACCESS Strength database.
- 8 Perform other related tasks as requested.

Occupational Safety & Health Specialist

The Occupational Safety & Health Specialist is primarily responsible for:

- 1 Providing assistance and counseling to department employees regarding workers compensation claims and entitlements.
- 2 Ensuring that employees retiring on compensable disability retirement complete and file all pertinent forms and documents via the City Retirement Office.
3. Maintain a database of the department's Workers' Compensation Leave, Sick Leave, Family Medical Leave, Leave without Pay, Light Duty/Restricted Duty personnel and generating a weekly personnel status report.
4. Coordinate with the City's Risk Management Office and Third Party Administrator, as necessary, regarding worker's compensation claims and police vehicle liability claims.
5. Ensure the completion of necessary occupational injury / illness and police vehicle accident reporting.
6. Conduct monthly safety inspections and coordinate with supervisors to identify and correct potential safety issues.
7. Conduct departmental training to ensure compliance with applicable employment laws and with the department's accreditation standards.
8. Research OSHA standards and providing periodical updates on changes that affect the department.
9. Participate on the department's Risk Management Review Board, as necessary.
10. Assisting other staff and departments as needed.
11. Attend monthly city safety officer and quarterly third party administrator meetings.
12. Daily process of occupational injury / illness and police vehicle accident reports to the third party administrator.
13. Track department's OSHA record keeping in accordance with current federal and state guidelines.

Human Resource Consultants

Human Resources Consultants provide employee relations assistance, as deemed appropriate, relative to HR assignments and responsibilities. The HRC will serve as a liaison with the Unit, each RPD functional area and the Central HR Department. The primary responsibilities of the HRC include, but are not limited to:

- 1 Knowledge of personnel management, employment laws and departmental hiring practices.
- 2 Support RPD employees in their functional areas with assistance on employment law interpretation, as well as departmental policy and practice information regarding Personnel Rules and Administrative Regulations.
- 3 Process, review and account for all RPD employee Performance Evaluations.
- 4 Manage the RPD civilian hiring process.
- 5 Manage employee's Family Medical Leave Benefits.
- 6 Conduct training on HR issues pertinent to RPD employees.
- 7 Analyze & advise employment related processes and recommend improvements to HR Chief.
- 9 Develop and coordinate statistical report as needed.
- 10 Research changes in employment law, administrative regulations and personnel rules and provide updates and department impact statements.
- 11 Assist other division personnel as needed.

Senior Training Coordinator

The Senior Training Coordinator is responsible for the development, implementation and facilitation of civilian professional development training in RPD. The Senior Training Coordinator will be trained in career development and training practices upon hire and periodically throughout their tenure, pending budgetary restraints and departmental availability. The primary responsibilities include, but are not limited to:

1. Bi-annual training needs analysis of the civilian professional development program
2. Design programs, training modules to support departmental training needs, to include developing content, scenarios and materials.
3. Facilitate trainings and/or workshops.
4. Coordinate and manage co-facilitators, training locations and course materials.
4. Identify behavior and skill gaps and recommend appropriate courses of action.
5. Manage and report on program results and evaluations.
6. Create solutions that anticipate new needs in the organization.
7. Record employee training hours and cost.
8. Assist with other human resource/ sworn training functions such as recruiting, employee relations and academies and other departmental projects as assigned.

RECRUITMENT PLAN

The Human Resources/Personnel and Recruitment Unit maintains a recruitment plan for full-time sworn personnel that includes the following elements:

1. A statement of objectives.
2. A plan of action designed to achieve the identified objectives.
3. Procedures to evaluate the progress toward objectives every three years.

RECRUITMENT PROCESS

The HR Division Chief has the authority and responsibility for developing and administering the Department's recruiting program. The Recruitment team is responsible for seeking qualified, diverse candidates, regardless of race, color, sex, national origin, age, or any other condition which might constitute illegal discrimination.

As stated, all members of the HR/Personnel and Recruitment unit are designated Recruiters. The Primary Recruitment Officer, in conjunction with the Personnel & Recruitment Sergeant is responsible for developing career fair/job fair opportunities outside of the department that attract candidates from diverse backgrounds who are interested and qualified for a law enforcement career. The Recruitment Sergeant designates staff on a rotating basis to attend each job fair with the Primary Recruitment Officer. All potential applicants are given information regarding the minimum qualifications for the positions in which they are interested in. Recruiters will ensure follow up with potential candidates after the initial contact. All potential applicants are encouraged to visit our website to submit an on-line application.

APPLICATION PROCESS

Applicant Information

Prior to or at the time of the written test, the applicant will be given information that lists all requirements, the steps of the selection process and its approximate length of time. If an applicant is not selected for appointment or is rejected at any phase, the Personnel & Recruitment unit will notify the applicant in writing, within 30 days after such determination is made. Applicants are given an opportunity to correct omissions or deficiencies prior to the testing or interview process. Applicants not selected will receive, in addition to written notice of their disposition, the process for reapplying, re-testing and/or re-evaluation, as appropriate. The Personnel & Recruitment Unit will maintain for three years, the files of those applicants who were rejected, not continued in the process, or not selected for the position applied. At the end of 3 years, all files will be appropriately archived and/or disposed. All applicant records of those individuals who are employed by the department will be maintained in their entirety in accordance with the State of Virginia's Record Retention Policy.

Outline of the Hiring Process

Federal and State regulations guide the department's hiring process. Each component of the selection process is designed to predict job performance or detect important aspects of the applicant's character and work-related behavior as it pertains to the position in question. All phases are designed in accordance with applicable laws and regulations considering utility, validity, adverse impact, and fairness to each applicant.

Initial Application Screening - The Personnel & Recruiting Unit (Admin Program Support Assistant/Clerical) will initially screen and certify each sworn application as meeting minimum requirements. HR staff will screen all permanent civilian applications. The Primary Recruitment Officer will screen all intern applications.

Written Test - Police Officer applicants must pass an entry-level Police Officer Applicant Written Examination that is designed to measure an ability to learn and apply police information; to remember details such as names, descriptions, and facts; to follow directions; to use proper judgment and logic; and to evaluate reading comprehension. A member of the Personnel & Recruitment unit will notify sworn applicants who fail to attain a passing score prior to their departure from the test site. Applicants who fail to achieve the passing score are eligible to retest two additional times within 1 year. “Certified” Virginia law enforcement officers, VACORPS applicants, and those who have successfully graduated from an out-of-state police academy and served as a police officer, are not required to complete the written test. However, they must successfully complete all other phases.

Communications officers must pass computer based assessment designed to measure an ability to handle the responsibilities of DEC. Applicants who successfully pass the written examination will proceed to the next phase of the process. A member of the HR Staff will notify DEC applicants and all other civilian applicants failing to successfully complete the testing phase and advise of re-test options.

Physical Agility Test - All Police Officer applicants are required to successfully complete a physical agility test validated and prepared by the academy. The test will evaluate cardiovascular fitness, flexibility and upper and lower body strength, and is intended as a measurement of the applicant’s physical suitability for police functions. Applicants who fail the agility test are eligible to retest two additional times within 6 months.

Preliminary Document Review – Background Investigators will review the submitted Part I Questionnaire and related documents to ensure the applicant fully complies with minimum departmental hiring standards. This will also include a review of the pre-screening form.

Initial Background Interview – All Applicants who successfully complete the initial application screening undergo an Initial background interview. This interview consists of questions designed to detect important aspects of the applicant’s character and work-related behavior in accordance with federal and state laws and regulations, and completion of a conditional offer of probationary employment. Non-sworn applicants participate in a panel interview coordinated by the HR staff and hiring manager.

Polygraph Examination (Police Officer applicants only) – Police Applicants who are considered a viable prospect for future employment are then scheduled for a polygraph examination. The polygraph is an investigative tool to assist the department in determining the accuracy of information that the applicant has provided. It also assists in uncovering abnormal character traits. The polygraph test shall not be the single determinant used in rejecting a candidate; however, any admissions made during the interview, before or after the actual polygraph test, will be considered in the employment decision. A trained and licensed polygraph examiner administers the polygraph examination in accordance with the Standards of Practice set forth by the Virginia Department of Professional and Occupational Regulations.

Applicant Background Investigation – Background investigators conduct a comprehensive background investigation using the Background Investigation Questionnaire. At a minimum, the

background investigator conducts the Criminal History Check through NCIC/VCIN, a local records check within City of Richmond and immediate surrounding jurisdictions, and a check with local authorities in the applicant's place of residence; obtain a Credit History Report via Equifax; perform a traffic check through the Department of Motor Vehicles in Virginia and the applicant's state(s) of residence; verify education and/or military service, as appropriate; review personnel files and interview personal and professional references and other individuals who associate or have associated with the applicant. The investigator also interviews the applicant to clarify information and provide the applicant the opportunity to refute any incriminating information the applicant claims to be false. The investigator condenses the results of the investigation into a final summary memorandum containing pertinent information, to include the investigator's observations of the applicant and relevant perceptions as to the candidate's suitability for employment. The investigator shall recommend if the candidate meets or does not meet the minimum requirements and should be considered for employment. If there are any mitigating circumstances, the investigator shall recommend that the investigation be scheduled for review during the Unit's Investigative Target Review session.

Psychological Evaluation (Police Officer applicants only) - Psychological evaluations are conducted by a licensed, clinical psychologist and include written and oral evaluations. The written test involve the use of selected pen and pencil or computer generated personal inventory instruments and a structured oral interview which consists of a review of the written personality tests and a clinical appraisal. The clinical psychologist submits a report based on the above information along with the interviewer's professional judgment regarding the suitability of the applicant to be a police officer.

Pre-employment Comprehensive Physical Assessment (Police Officer applicants only)- The comprehensive physical assessment consists of a review of the applicant's medical history, a drug-screening test, and a physical examination conducted by a city approved medical physician. The physician, provided with the essential tasks of the position, will render a medical opinion as to the applicant's physical condition to perform the required duties.

Pre-employment limited physical examination and drug screening-(Civilian applicants) Civilian applicants will undergo a pre-employment physical examination and drug screening test as required by the City's Administrative Regulations.

Written Statement (Police Officer applicants only) – Applicants must submit a statement in their own handwriting to enable a review of the applicant's use of the English language and writing skills.

Ride Along – (Police applicants only) Applicants will be allowed to complete a "ride along" with a selected City of Richmond Police Officer as part of the evaluation process. The officer is to observe the applicant's behavior and attempt to determine the applicant's suitability for police work. The applicant may also complete a "ride along" earlier in the process, if desired, as coordinated by the Recruitment Team. The officer will provide a written evaluation of the "ride along" candidate to the Personnel & Recruitment unit.

SELECTION

The Chief of Police, as the department's Appointing Authority, makes the final departmental decision on hiring, the HR Division Chief is delegated the responsibility for the selection process. The Chief of Police sets the standards that determine the skills and attributes required for employment.

Selection Administration

The Personnel & Recruitment Unit has measurement instruments to determine the abilities and characteristics of applicants. Assistance from the Richmond Police Department Human Resources' staff is requested as needed. The Personnel & Recruitment Unit ensures that all selection material and applicant files are maintained in a secure facility and only personnel involved in the selection process have access to the files selection process. Annually, the HR Chief and HR Personnel & Recruitment Lieutenant will complete an evaluation of the selection process to ensure that it is still relevant and valid.

Salary Determination. The salary offered to police officer applicants selected to attend the Basic Recruit Academy is generally based on the following guidelines:

- All Police Recruit applicants employed will receive the base salary.
- Lateral Police Officer applicants are entitled to receive higher initial salaries, as administrated under the department's lateral hire program.
- Salary negotiations for sworn officers will be conducted by the HR Division Chief with final approval from the Chief of Police.
- Civilian salary negotiations will be conducted by the area Human Resources Consultant in conjunction with the HR Division Chief. The Chief of Police will approve final salary offers.
- Former Richmond Police Officers who return to duty with RPD w/n 12 months and are still certified by DCJS will have their former salaries and career development levels reviewed on a case-by-case basis to determine compensation upon re-entry.
- All candidates are notified in writing of their salary and position classification.

ORIENTATION PROCESS

On the first day of employment, all employees report to the 2nd floor Police Recruitment & Personnel Unit for Employee Orientation.

During orientation, employees are required to fill out all forms as guided by employment law and city employment practices. These forms include, but are not limited to:

1. Personal identification forms, including, I-9 forms, W-4 tax information forms
2. Receipt acknowledgment of Personnel Rules, Administrative Regulations and departmental General Orders

Employees are also given an overview of the department structure and a tour of the Headquarters facility. New employees also undergo fingerprinting and must take an ID photo. Upon completion of orientation, employees are released to their new supervisors.

RECORDS RETENTION

Personnel records (including, but not limited to, application data, background information and results from medical and psychological examinations) are to be kept confidential with limited access to those individuals who are required to utilize the records for work-related tasks only. Individuals seeking access must submit a written request through their chain to the HR Division Chief for approval. Such records shall never be left unattended and are stored in locked files to provide 24-hour security. Personnel records are maintained in accordance with the Virginia Records Retention and Disposition General Schedule. Records on the testing results of each applicant are maintained for a minimum of three years.

UNIFORMS AND EQUIPMENT

Sworn members of the Personnel and Recruitment Unit wear plainclothes business attire to perform their regularly assigned duties, unless otherwise directed. The HR Lieutenant will be in uniform and/or plainclothes at his/her discretion or unless otherwise directed. All sworn members will maintain police equipment and uniforms in good working order/condition and present same for inspection when requested.

EQUAL EMPLOYMENT OPPORTUNITY (EEO) PLAN

The Human Resources Division maintains an Equal Employment Opportunity Plan that is reviewed biennially and updated as necessary. The Equal Employment Opportunity Plan is posted on the Richmond Police Department website and contains, at a minimum the following:

- Departmental equal employment opportunity objectives
- Utilization Analysis

The Human Resources Division will provide an annual analysis to the Chief of Police each year regarding the following:

- The impact of current policies, procedures and practices on the employment of protected class applicants
- The actions taken and the progress made in furtherance of the recruiting objectives
- Recommendations to revise the recruiting plan, if applicable